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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS

IN RE: DEALER MANAGEMENT SYSTEMS

ANTITRUST LITIGATION

MDL No. 2817 Case No. 18 C 864

This filing relates to Authenticom,

Inc. v. CDK Global LLC, et al.

MOTION FOR LEAVE TO FILE UNDER SEAL

Defendant The Reynolds & Reynolds Company's Answer and Counterclaims against

Authenticom contain information that has been designated "confidential" and "highly

confidential" under the Agreed Confidentiality Order (Dkt. 104). The information so designated

by Reynolds is confidential business information and contract language. Therefore, Reynolds

cannot file an unredacted copy of its Answer and Counterclaims in the public docket. Reynolds

respectfully requests that this Court enter an order permitting Reynolds to file an unredacted copy

of its Answer and Counterclaims under seal. Reynolds will file a redacted, public copy of its

Answer and Counterclaims as well.

Dated: June 29, 2018

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of June, 2018, I caused a true and correct copy of the foregoing Motion for Leave to File Under Seal to be served on all counsel of record via the Court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Aundrea K. Gulley
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